

site at 33° 44' 22", 84° 00' 14".

The distance between these two modified sites was 181.4 miles (292 kilometers). Section 73.611(b) of the Commission's Rules states that "[s]tation separations in licensing proceedings shall be determined by the distance between the coordinates of the proposed transmitter site in one community and (1) [t]he coordinates of an authorized transmitter site for the pertinent channel in the other community." Section 73.610(b) indicates that the minimum co-channel station separation which applies in this instance is 174.5 miles (280.8 kilometers).

Thus, the WHSG and WTSU-TV sites exceeded the spacing requirements by nearly 7 miles when the Commission granted the WHSG Construction Permit, and no waiver of the spacing standards was required.

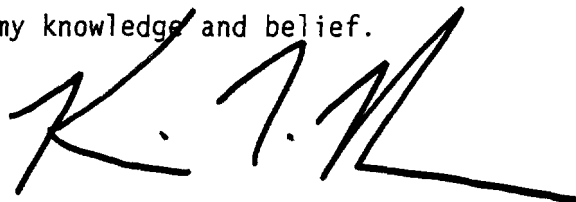
The FCC subsequently cancelled the WTSU-TV Construction Permit, and the channel again became an allotment. Normally, the reference coordinates for Montgomery would have been specified for the Channel 63 allotment, but due to the presence of WHSG, the use of the allotment was restricted to the west of Montgomery.

The engineering contained in the Glendale motion suggests that there is sufficient area within which to locate a new station on Channel 63 in Montgomery, taking into account the required spacing to the Glendale site. What is not mentioned, however, is that if Glendale's site were properly distanced from the Montgomery reference coordinates, it would increase the permissible area for an assumed Montgomery facility by more than

250 percent (from 200 square miles to approximately 530 square miles). What's more, this increased location area would include almost half of the community of license. Exhibit D is the map from Glendale's engineering showing, upon which the additional allocation area is shown.

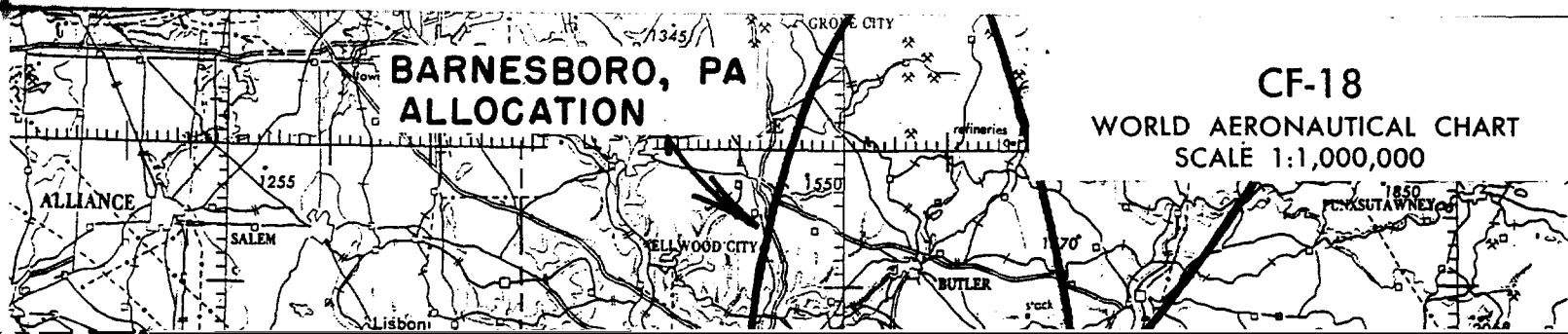
In summary, while Glendale seems to draw some of its arguments from those contained in the referenced FM proceedings, the Monroe television situation is quite different. There were no fully spaced allocation areas within which the competing FM applicants could locate a site and yet place the requisite service over the city of license; there *is* sufficient area that is fully spaced to the Montgomery allocation, from which Monroe can receive a City Grade signal. Simply by requiring that Glendale specify a site within this non-short-spaced area, the FCC would more than double the allocation area for a Channel 63 proposal in Montgomery, thereby making a site restriction unnecessary.

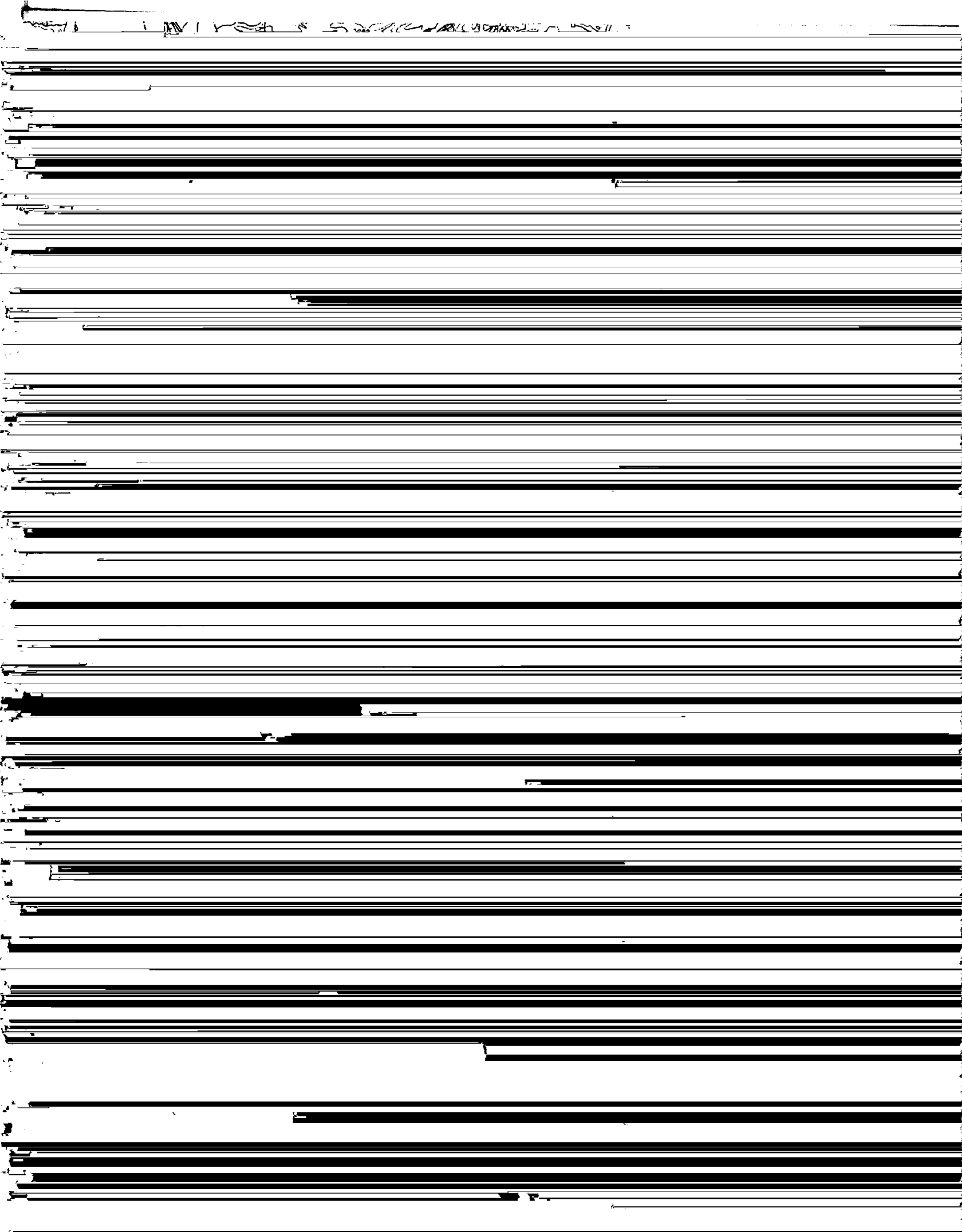
I declare, under penalty of perjury, that the foregoing statements and the attached exhibits, which were prepared under my direct supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a long horizontal line extending from the end of the signature.

KEVIN T. FISHER

August 3, 1993





ATLANTA
SECTIONAL AERONAUTICAL CHART
SCALE 1:500,000

The chart displays the Atlanta metropolitan area and surrounding regions. Key features include:

- Airports:** Atlanta-Fulton County Stadium (ATL), Hartsfield International Airport (ATL), and several smaller airports like Dalton and Cornelia.
- Topography:** Elevation contours are shown, with major peaks like Mount Olin (2082 feet) and Mount Yonah (2060 feet).
- Water Bodies:** The Chattahoochee River and Lake Lanier are prominent.
- Infrastructure:** Major roads (Interstates 75, 85, 90) and the railroad network are depicted.
- Navigation Aids:** VOR/DME stations are marked for Atlanta (ATL 113.7), Dalton (DAL 113.7), and Cornelia (COR 113.7).
- Other Landmarks:** The Stone Mountain is indicated near Atlanta.

ATLANTA

SECTIONAL AERONAUTICAL CHART

SCALE 1:500,000

The chart displays the Atlanta metropolitan area and surrounding regions. Key features include:

- Airports:** Atlanta-McCollum Field (ATL), Hartsfield International Airport (ATL), and several smaller airports like Dalton and Cornelia.
- Topography:** Elevation contours are shown, with peaks reaching over 3,000 feet in the north and west.
- Water Bodies:** The Chattahoochee River and Lake Lanier are prominent.
- Infrastructure:** Major roads and highways are depicted with their respective route numbers.
- Navigation Aids:** VOR and VORTAC stations are marked with their frequencies and identifiers.
- Communication:** Unicom and Tower frequencies are listed for various airports.
- Obstacles:** Obstruction symbols and their MSL/AGL altitudes are provided for various locations.
- Other Labels:** Towns like Dalton, Cornelia, and various smaller communities are labeled.



RECEIVED

JUL 28 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In Re Applications of)	MM Docket No. 93-156
TRINITY CHRISTIAN CENTER OF SANTA)	
ANA, INC., d/b/a TRINITY)	
BROADCASTING NETWORK)	BRCT-911129KR
For Renewal of License of)	
Television Station WHSG(TV))	
Monroe, Georgia)	
GLENDAL E BROADCASTING COMPANY)	RPCT-920228KE

Request No. 1

That there are one or more sites available to Glendale which are fully-spaced under Section 73.610 of the Commission's Rules and technically suitable for use as transmitter sites for a television station operating on allocated Channel 63, Monroe, Georgia.

Respectfully submitted,

TRINITY CHRISTIAN CENTER OF SANTA
ANA INC., d/b/a TRINITY
BROADCASTING NETWORK

By: Colby M. May
Colby M. May
Joseph E. Dunne, III *hjs*

May & Dunne, Chartered
1000 Thomas Jefferson Street,
N.W. - Suite 520
Washington, D.C. 20007
(202) 298-6345

By: Nathaniel F. Emmons
Nathaniel F. Emmons
Howard A. Topel

Mullin, Rhyne, Emmons and Topel,
P.C.
1000 Connecticut Ave. - Suite 500
Washington, D.C. 20036-5383
(202) 659-4700

July 8, 1993

CERTIFICATE OF SERVICE

L. Nathaniel F. Emmons of the law firm of Mullin. Rhvne.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In re Application of)	MM Docket No. 93-156
)	
Trinity Christian Center of)	
Santa Ana, Inc., d/b/a TRINITY)	
BROADCASTING NETWORK)	File No. BRCT-911129KR
)	
For Renewal of License of)	
Commercial Television Station)	
WHSB-TV, Monroe, Georgia)	
)	
and)	
)	
GLENDAL BROADCASTING COMPANY)	File No. BPCT-920228KE
)	
For Construction Permit)	
Monroe, Georgia)	

To: Honorable Joseph Chachkin
Administrative Law Judge

RESPONSE TO REQUEST FOR ADMISSION

Glendale Broadcasting Company (Glendale), by its attorneys, now responds to the "Request for Admission" submitted by Trinity Christian Center of Santa Ana, Inc. d/b/a/ Trinity Broadcasting Network on July 8, 1993.

Response: DENIED. The two sites which Glendale has had reasonable assurance of site availability for are short-spaced to the reference point for Channel 63, Montgomery, Alabama. The site from which WHSB broadcasts is also short-spaced to that reference point. Glendale is without knowledge as to

whether there are sites (1) that are fully-spaced to all stations and allocations under Section 73.610 of the Commission's rules, and (2) that are available and suitable for use as an antenna and transmitter site.

Respectfully submitted,

GLENDALE BROADCASTING COMPANY

By John J. Schauble
Lewis I. Cohen
John J. Schauble

Cohen and Berfield, P.C.
1129 20th Street, N.W., # 507
Washington, D.C. 20036

DECLARATION

George F. Gardner, under penalty of perjury, now declares that the attached "Response to Request for Admission" is true and correct to the best of his knowledge and belief.

July 21, 1993
Date

George F. Gardner
George F. Gardner
President
Glendale Broadcasting Company

CERTIFICATE OF SERVICE

I, Susie Cruz, do hereby certify that on the 22nd day of

STATEMENT

I, Randy Mullinax, hereby state as follows:

1. I am the chief engineer of WFOX(FM), Gainesville,
Florida. I am licensed as a Professional Engineer in the State of Florida.

VERIFIED STATEMENT

I, Harvey Budd, hereby state as follows:

1. I was the president of Monroe Television, Inc. ("MTI"), the corporate entity which originally filed for and received a construction permit for channel 63, Monroe, Georgia. MTI's application was filed on December 16, 1986 (BPCT-8612166L), and was granted on October 1, 1987.

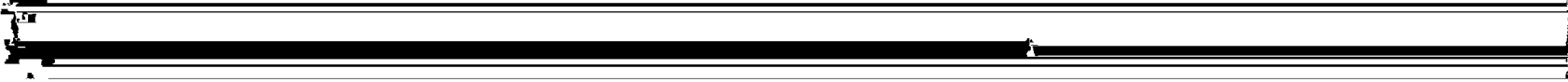










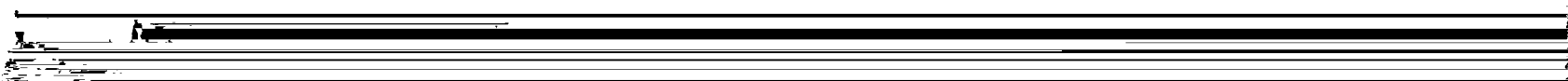
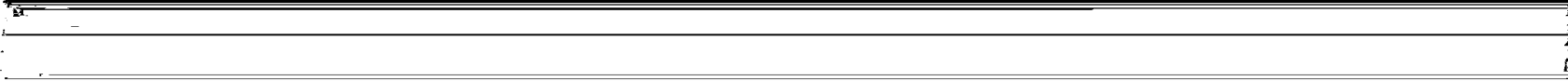
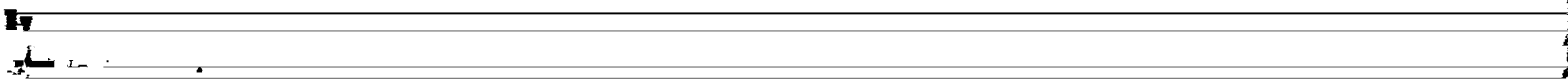
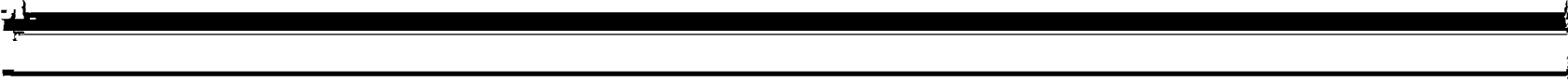

2. During the pendency of MTI's application for channel 63, Monroe, Georgia, a short-spacing developed with the allocation for noncommercial television channel 63 to Montgomery, Alabama. As a result, MTI searched for alternative sites for its application for channel 63 in Monroe and in March of 1987 began discussions with Shamrock Broadcasting, Inc., the owner of an antenna tower in a rural area 13.5 kilometers east of Buford, Georgia. This was the newly constructed tower used by WFOX(FM), Gainesville, Georgia, licensed to Shamrock Broadcasting, Inc.

3. The WFOX tower is located at NL 34° 07' 32", WL 83° 51' 31". The tower is 515 meters above ground, and 772 meters above mean sea level. There is a top mounted antenna on the tower and the total structure is 538 meters above ground (800 meters AMSL).

4. During the time in early 1987 when MTI was considering a move to the WFOX tower, I learned that the tower was designed to accommodate a full power television antenna. There are no full power television antennas on the tower.

5. During the weeks of July 20 and July 27, 1993 I spoke with Randy Mullinax, the chief engineer of WFOX, 200 River Edge Parkway, Atlanta, Georgia 30328, telephone number (404) 953-9369,

and inquired whether there is presently space on the WFOX tower which would permit installation of a full power television antenna, such as a Bogner or Dielectric antenna, at approximately the 496 meters above ground level (approximately 750 meters AMSL). T used



United States of America



FEDERAL COMMUNICATIONS COMMISSION

TELEVISION BROADCAST STATION CONSTRUCTION PERMIT

Official Mailing Address:

THE TROY STATE UNIVERSITY SYSTEM
UNIVERSITY AVENUE
TROY, AL 36082

Authorizing Official:

15
Clay C. Pendarvis
Chief, Television Branch
Video Services Division
Mass Media Bureau

Grant Date: 11-15-89

Call sign: WTSU-TV

Permit No. BNPET-890901KE

Channel: 63

Hours of Operation: Unlimited

Transmitter location (address or description):

W OF ST #97, 2.6 KM N. OF INT. W/US#80 NEAR LOWNDESBORO, AL.

Transmitter: Type accepted. See Sections 73.1560, 73.1565 and 73.1570
of the Commission's Rules.

Antenna type: (directional or non-directional): Directional

Desc: BOGNER BUI32

Beam Tilt: .50 degrees electrical

Major lobe directions (degrees true): 35.0 105.0

Antenna coordinates: North Latitude: 32 17 24.0
West Longitude: 86 36 40.0

Transmitter output power: As required to achieve authorized ERP.

Maximum effective radiated power (kW): 2400 Visual

Height of radiation center above ground : 145.0 Meters

Height of radiation center above mean sea level : 265.0 Meters

Height of radiation center above average terrain: 215.0 Meters

Overall height of antenna structure above ground (including obstruction
lighting, if any) : 152.0 meters

Call sign: WTSU-TV

Permit No.: BMPET-890901KE

Obstruction marking and lighting specifications for antenna structure:

It is to be expressly understood that the issuance of these specifications is in no way to be considered as precluding additional or modified marking or lighting as may hereafter be required under the provisions of Section 303(g) of the Communications Act of 1934, as amended.

Paragraph 1.0, FCC Form 715 (March 1978):

Antenna structures shall be painted throughout their height with alternate bands of aviation surface orange and white, terminating with aviation surface orange bands at both top and bottom. The width of the bands shall be equal and approximately one-seventh the height of the structure, provided however, that the bands shall not be more than 100 feet nor less than 1 and 1/2 feet in width. All towers shall be

Call sign: WTSU-TV

Permit No.: BMPET-890901KE

Paragraph 13.0, FCC Form 715 (March 1978):

On levels at approximately three-fourths and one-fourth of the over-all height of the tower, at least one 115- or 125-watt lamp (A21/TS) enclosed in an aviation red obstruction light globe shall be installed on each outside corner of the structure.

Paragraph 21.0, FCC Form 715 (March 1978):

All lighting shall burn continuously or shall be controlled by a light sensitive device adjusted so that the lights will be turned on at a north sky light intensity level of about 35 foot candles and turned off at a north sky light intensity level of about 58 foot candles.

Paragraph 22.0, FCC Form 715 (March 1978):

During construction of an antenna structure, for which obstruction lighting is required, at least two 115- or 125-watt lamps (A21/TS) enclosed in aviation red obstruction light globes, shall be installed at the uppermost point of the structure. In addition, as the height of the structure exceeds each level at which permanent obstruction lights will be required, two similar lights shall be displayed nightly from sunset to sunrise until the permanent obstruction lights have been installed and placed in operation, and shall be positioned so as to insure unobstructed visibility of at least one of the lights at any normal angle of approach. In lieu of the above temporary warning lights, the permanent obstruction lighting fixtures may be installed and operated at each required level as each such level is exceeded in height during construction.

United States of America

FEDERAL COMMUNICATIONS COMMISSION



TELEVISION BROADCAST STATION CONSTRUCTION PERMIT

Official Mailing Address:

MONROE TELEVISION, INC.
900 N.W. EIGHTH AVE.
GAINESVILLE, FL 32601

Authorizing Official:

151
Clay C. Pendarvis
Chief, Television Branch
Video Services Division
Mass Media Bureau

Grant Date: 11-29-89

Call sign: WHSG

This permit expires 3:00 am.
local time 06 months after
grant date specified above

Permit File No.: SMPCT-890809KE

This permit modifies Permit No.: 8612156L

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

This permit shall be automatically forfeited if the station is not ready for operation within the time specified (date of expiration) or within such further time as the Commission may allow, unless completion of the station is prevented by causes not under the control of the permittee. See Sections 73.3598, 73.3599 and 73.3534 of the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Name of permittee:

MONROE TELEVISION, INC.

Station Location:

GA-MONROE

Frequency (MHz): 764.0 - 770.0

Carrier Frequency (MHz): 765.25 Visual 769.75 Aural

Call sign: WHSG

Permit No.: BMPCT-890809KE

Channel: 63

Hours of Operation: Unlimited

Transmitter location (address or description):

9.9 KM NORTHEAST OF LITHONIA, GA.

Transmitter: Type accepted. See Sections 73.1660, 73.1665 and 73.1670
of the Commission's Rules.

Antenna type: (directional or non-directional): Non-directional

Desc: DIELECTRIC TFU-25 G

Beam Tilt: .50 degrees electrical

Major lobe directions (degrees true): Not Applicable

Antenna coordinates: North Latitude: 33 44 22.0
West Longitude: 84 00 14.0

Transmitter output power: As required to achieve authorized ERP.

Maximum effective radiated power (kW): 5000 Visual

Height of radiation center above ground : 343.0 Meters

Height of radiation center above mean sea level : 617.0 Meters

Height of radiation center above average terrain: 363.0 Meters

Overall height of antenna structure above ground (including obstruction
lighting, if any) : 350.0 meters